Division of Waste Management and Radiation Control

USED OIL PROCESSOR PERMIT

Permittee Name:	**Pacific West LLC**
Permittee Mailing Address:	1515 West 2200 South, Suite C Salt Lake City, UT 84119
Permittee Phone Number:	(801) 972-2727
Permittee Contact:	Michael Forrest, President (801) 972-2727 office (801) 510-7300 cell Email: mforrest@pacwestllc.com
Facility Processor Address:	5751 North Droubay Road Erda, Utah 84074
Facility Contact:	Brent Cole (385) 290-0358 cell Email: bcole@pacwestllc
Type of Permit:	**Used Oil Processor Permit**
Permit #:	**UOP-0xxx**
EPA ID #:	UTR000010165

Signature: _____ Date:_____

Scott T. Anderson, Director
Division of Waste Management and Radiation Control

I.A. Effect of Permit

I.A.1 Pacific West LLC (hereafter referred to as "Permittee") is hereby authorized to operate as a Used Oil Processor located at 5751 North Droubay Road, Erda, Utah 84074 in accordance with all applicable requirements of R315-15 of the Utah Administrative Code and of the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this Permit.

I.A.2. This permit shall be effective for a term not to exceed ten years in accordance with the requirements of R315-15-15 of the Utah Administrative Code.

I.A.3 Attachments incorporated by reference are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in Conditions I and II supersedes any conflicting language in the attachments or documents incorporated into the attachments.

I.A.4. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee's business activity in order to maintain compliance with the conditions of this Permit and its attachments

I.B. Permit Revocation

I.B.1. Violation of any permit condition or failure to comply with any applicable provision of the applicable statutes and rules shall be grounds for enforcement actions, including revocation of this Permit. The Director shall notify the Permittee in writing of his intent to revoke this Permit.

I.C. Permit Modification

I.C.1. The Permittee may request modifications to any item or operational activity covered by this Permit by submitting a written permit modification request to the Director. If the Director determines the modification request is substantive, a public hearing, a 15-day public comment period or both may be required before a decision by the Director on the modification request. Implementing a modification prior to the Director's written approval constitutes a violation of this Permit and may be grounds for enforcement action or permit revocation.

I.C.2. Changes in operational activities include any expansion of the facility beyond the areas designated, alteration of processing operational parameters, changes in the type or number of storage tanks, piping, other processing equipment and changes to the contingency plan.

I.C.3. The Director may require the Permittee to submit additional information when reviewing permit modification requests to ensure the safe handling of used oil at the processing facility in accordance with 19-6-710(3)(b)(xii) Utah Code Annotated.

I.C.4. The Director may modify this Permit as necessary to protect human health and the environment or because of statutory or regulatory changes.

I.C.5. The Permittee shall notify the Director, in writing, of any non-substantive changes, such as changes in the contact person, within 20 days of the change.

I.D. Emergency Controls Systems and Facility Maintenance

I.D.1 The Permittee shall maintain and operate the Processor facility to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems that could threaten human health and the environment.

I.D.2. The Permittee shall have communication systems, fire alarms and fire suppression equipment and processing alarms in place and operational at the facility, as well as arrangements with local emergency response teams (i.e. fire, police and hospital) in accordance with R315-15-5.3 of the Utah Administrative Code.

I.D.3. The Permittee shall have written documentation of the weekly inspections and maintenance of used oil processing equipment, secondary containment, containers, tanks, fire suppression systems (portable and fixed) and testing of emergency alarms for fire and other operational alarms set for processing equipment in accordance with R315-15-5.3(a)(2) of the Utah Administrative Code and the Inspections and Maintenance Schedules in Attachment 6.

I.D.4. Inspection documents shall include inspector's name, date, areas inspected, any problems found, and the subsequent actions taken by the facility to maintain system integrity.

I.D.5. To prevent access by unauthorized persons or vehicles during hours when the facility is closed and authorized personnel are not present, the Permittee shall secure the facility, lock the entrance security gate and maintain adequate perimeter fencing.

I.D.6. The Permittee shall maintain spill kits and fire extinguishing equipment as specified in Attachment 2.

I.D.7. A secondary containment system for used oil containers, process and storage tanks, and piping and ancillary equipment shall be maintained for the facility in accordance with R315-15-5.5(c) of the Utah Administrative Code. The Permittee shall construct and maintain the secondary containment as described in Condition II.C.6.

I.D.8. Used oil, water or other liquids that may accumulate in the secondary containment system or any ancillary facility sumps shall be removed within 24 hours of discovery to prevent the possible migration to soil, ground or surface waters.

I.E. Contingency Plan and Emergency Procedures

I.E.1. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. In the event of a release of used oil, the Permittee shall immediately take appropriate actions to comply with R315-15-9 of the Utah Administrative Code and this Permit, Attachment 2, Contingency Plan and Emergency Response.

I.E.2. The Permittee shall keep a current copy and all revisions of the contingency plan on site until facility closure.

I.E.3. The Permittee shall provide a current copy to local police, fire departments, hospitals and State local emergency response teams that may be called upon during an emergency in accordance with R315-15-5.3(b)(3).

I.E.4. The Permittee shall implement the Contingency Plan whenever there is an imminent or actual emergency situation.

I.E.5. The Permittee shall notify the Utah Department of Environmental Quality 24-hour Answering Service, (801) 536-4123, for used oil releases exceeding 25 gallons or for smaller releases that pose a potential threat to human health or the environment in accordance with R315-15-9.1 of the Utah Administrative Code. The Permittee shall provide the information required by R315-15-9.1(c) of the Utah Administrative Code.

I.E.6. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil. The report shall also include a description of actions taken by the Permittee to prevent future spills.

I.F. Operating Record

I.F.1 The Permittee shall maintain an operating record (paper or electronic) in accordance with R315-15-5.8 of the Utah Administrative Code until final closure of the facility.

I.F.2. The operating record shall include the date, the name of the processing facility equipment operator, the processing system start-up and shut-down times, any upset condition (e.g. alarms, mechanical failure, or any event that requires implementation of the facility's Contingency Plan).

I.F.3. The Permittee shall have used oil sampling records and analytical results, tank storage volumes, and the volume of oily water processed through the system.

I.F.4 The Permittee shall retain records detailing the mass balance of wastewater entering and leaving the facility. This includes wastewater discharge records. This does not include water used in non-contact cooling processes.

I.F.5. The Permittee shall document the volume of used oil transferred into and transferred out of each tank.

I.G. Tracking Records

I.G.1. The Permittee shall keep a written record of each used oil load received, transferred and delivered, including volumes, locations and dates.

I.G.2. The Permittee shall document the acceptance of used oil in accordance with R315-15-5.7(a).

I.G.3. The Permittee shall document the delivery of used oil in accordance with R315-15-5.7(b).

I.G.4. The Permittee shall keep transportation records of offsite used oil shipments delivered to and shipped from this facility. The Permittee shall only use Utah-permitted used oil transporters to ship used oil to or from this facility.

I.G.5. The Permittee shall maintain used oil storage tank records (bulk storage) that document the date, time, operator (initials), and volume of the used oil deposited into each tank and the date, time, operator (initials), and destination of the used oil removed from each tank (including inter-tank transfers).

I.H. Record Retention

I.H.1. The Permittee shall maintain all used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permitee's Processor facility ~~located at located~~ at 1515 West 2200 South, Suite C, Salt Lake City, Utah.

I.H.2. Records may be in hard copy or in an electronic format and shall be readily accessible for inspection by authorized representatives of the Director. The Permittee shall maintain, for a minimum of three years, all applicable used oil processor associated records required by R315-15 of the Utah Administrative Code and this Permit, with the exception of the operating record, which shall be kept until facility closure.

I.H.3 The Permittee shall maintain other records (e.g. training and financial assurance) required by R315-15 of the Utah Administration Code and this Permit.

I.I. Sampling and Analysis Plan

I.I.1. The Permittee shall follow all sampling and analytical procedures in Conditions II.E and Attachment 4, Used Oil Sampling and Analysis Plan, when conducting used oil sampling and analytical testing to meet the requirements of R315-15-5.4 and 5.6 of the Utah Administrative Code and this Permit.

I.I.2. The Permittee shall have laboratory analytical data, that documents the PCB concentration of used dielectric mineral oil drained from electrical transformers and other electrical equipment, regulated under 40 CFR § 761, prior to acceptance and placement in the facilities used oil storage tanks, containers, or processing equipment.

I.J. Prohibitions

I.J.1. The Permittee shall not manage used oil in surface impoundments or waste piles.

I.J.2. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner specified in R315-15-1.3 of the Utah Administrative Code.

I.J.3. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to the rules applicable to hazardous waste and PCB-contaminated waste.

I.J.4. Used oil shall not be stored in containers, tanks, or piping that have previously stored hazardous waste, unless the containers, tanks, and piping are cleaned in accordance with R315-261-7 of the Utah Administrative Code

I.J.5. The Permittee shall not accept used oil for storage or processing with a PCB concentration greater than or equal to 50 mg/kg (ppm).

I.J.6. The Permittee shall manage used oil with PCB concentrations of greater than or equal to 2 mg/kg but less than 50 mg/kg in accordance with R315-15-18 of the Utah Administrative Code. Used oil shall not be diluted to avoid any provision of any Federal or State environmental regulation.

I.J.7. Used oil shall not be stored in tanks, containers or associated piping that have previously stored PCB contaminated materials at or above 50 mg/kg (ppm), unless the tanks, containers, and piping or storage units are decontaminated as described in 40 CFR 761 Subpart S.

I.J.8. Any used oil that was mixed with the PCB-contaminated material shall be managed in accordance with R315-15-18 of the Utah Administrative Code and 40 CFR 761 Subpart S.

I.K. Waste Characterization and Disposal

I.K.1. The Permittee shall properly characterize used oil waste related material to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 and R315-15-18 of the Utah Administrative Code and manage it accordingly.

I.K.2. The Permittee shall document and maintain records showing proper characterization, handling and disposal for all used oil related waste, including oily wastewater if sent for disposal.

I.K.3. The Permittee shall notify the Director within 24 hours of any used oil found at the facility with PCB concentrations greater than or equal to 50 mg/kg (ppm).

I.K.4. The Permittee shall document and maintain analytical and disposal records for a minimum of three years. The Permittee shall characterize waste generated during the spill cleanup to determine if the waste is hazardous or non-

hazardous in accordance with R315-15-8 and R315-15-18 of the Utah Administrative Code.

I.L. Liability and Financial Assurance Requirements

I.L.1. The Permittee shall be financially responsible for cleanup and closure costs, general liabilities and environmental pollution legal liability for bodily or property damage to third parties resulting from sudden release of use oil in accordance with R315-15-10 through 12 of the Utah Administrative Code and this Permit.

I.L.2. The Permittee shall provide documentation of financial responsibility, for cleanup and closure, environmental pollution legal liability, and general liability coverage annually to the Director for review and approval by March 1 of each reporting year or upon request by the Director.

I.L.3. The Permittee shall receive written approval from the Director for any changes in the extent, type (e.g., mechanism, insurance carrier or financial institution), or amount of the environmental pollution legal liability or financial assurance mechanism for coverage of physical or operational conditions at the facility that change the nature and extent of cleanup and closure costs. The Permittee shall receive approval from the Director prior to implementation of changes.

I.M. Cleanup and Closure Plan

I.M.1. The Permittee shall update its closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code, Condition II.G, and Attachment 7 of this Permit.

I.M.2. The Permittee shall initiate closure of the facility within 90 days after the Permittee receives the final volume of used oil or after the Director revokes the Permittee's Processor Permit in accordance with the requirements of R315-15-11.3 of the Utah Administrative Code and this Permit.

I.M.3. The Permittee shall remove or decontaminate used oil residues in tanks, containment system, and the environment in accordance R315-15-5.5(f) of the Utah Administrative Code and this Permit's Closure Plan, Attachment 7.

I.M.4. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification that the facility has been closed in accordance with R315-15-11.4 of the Utah Administrative Code and the specifications of the approved cleanup and closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.

I.M.5. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed according to R315-15 of the Utah Administrative Code.

I.N. Used Oil Handler Certificate

I.N.1 In accordance with R315-15-5.9 of the Utah Administrative Code, the Permittee shall not operate as a used oil processor without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Administrative Code Annotated Section 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.

I.O. Inspection and Inspection Access

I.O.1. Any duly authorized employee of the Director may, at any reasonable time and upon presentation of credentials, have access to and the right to copy any records relating to used oil and to inspect, audit or sample. The employee may also make record of the inspection by photographic, electronic, audio, video or any other reasonable means to determine compliance.

I.O.2. The authorized employees may collect soil, groundwater or surface water samples to evaluate the Permittee's compliance.

I.O.3. Failure to allow reasonable access to the property by authorized employees is a "denial of access" and may be grounds for enforcement action or permit revocation.

I.P. Annual Report

I.P.1 As required by R315-15-13.5 of the Utah Administrative Code, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of the following year. The Annual Report shall describe the Permittee's used oil activities in Utah and document financial assurance using the Division's Processor Annual Report form.

I.Q. Other Laws

I.Q.1. Nothing in this permit shall be construed to relieve the Permittee of his obligation to comply with any Federal, State or local law.

I.R. Enforceability

I.R.1. Violations documented through the enforcement process pursuant to Utah Code Annotated 19-6-112 may result in penalties assessed in accordance with R315-102 of the Utah Administrative Code.

I.S. Effective Date

I.S.1. The permit is effective on the date of signature by the Director.

II.A. General Operations

II.A.1 The Permittee is authorized to store and process via gravity separation used oil in accordance with R315-15-5 of the Utah Administrative Code at 5751 North, Droubay Road, Erda, Utah, 84074.

II.A.2 The Permittee is authorized to store a maximum of 16,000 gallons of used oil in tanks described in Condition II.C of this Permit.

II.A.3. The Permittee shall have a current process and instrument diagram (PID), certified by a Utah professional engineer (Attachment 5), prior to storing used oil at this facility.

II.A.4. The Permittee shall only store used oil in tanks, containers or units subject to regulations under R315-265 or R315-264 of the Utah Administrative Code and maintain tanks, containers, associated piping, pumps and valves in good operational condition.

II.A.5. The Permittee may only accept used oil from a Utah-permitted used oil transporter or deliveries of exempted oily wastewater from waste haulers that maintain all required permits or registrations with the State, counties or municipalities.

II.A.6. The Permittee shall only accept shipments of used oil from trucks owned and operated by the Permittee.

II.A.7. The Permittee shall verify, at the time of acceptance, that the transporter delivering the used oil has recorded the halogen content of the used oil on the shipping documents.

II.A.8. If the transporter has not documented the halogen content on the shipping records, then the Permittee shall determine the halogen content of the shipment of used oil received at the facility, at the time of acceptance.

II.A.8.a. The Permittee shall determine the halogen content by collecting a representative sample in accordance with Condition II.D and Attachment 4, then screening the used oil sample for halogens, or by submitting the sample to a Utah-certified laboratory for analysis in accordance with the analytical requirements of Attachment 4.

II.A.8.b. When performing halogen tests, the Permittee shall then record the results of the halogen testing on the shipping document prior to shipment from the facility.

II.A.9. The Permittee is not required to further test used oil from a Utah-registered used oil marketer if the marketer provides, at the time of acceptance, analytical data results documenting that the used oil has been tested for the parameters in R315-15-1.2 of the Utah Administrative Code.

II.A.10. The Permittee may accept bulk used oil transported in 3000-gallon tanker trucks. The Permittee may also accept used oil in drums or containers.

II.A.11. Used oil recovered from oily water shall be managed as used oil in accordance with R315-15 of the Utah Administrative Code and this Permit.

II.A.12. The Permittee shall not accept or store used oil with PCB concentrations greater than or equal to 50 mg/kg (ppm).

II.B Processing Description

II.B.1. The Permittee shall not perform any processing of used oil except for gravity separation and may store used oil in excess of 35 days in the manner described in Attachment 1 of this Permit.

II.C. Used Oil Storage

II.C.1. The Permittee shall only store used oil in the tanks specified in Table 1:

Table 1-- Facility Tanks

Tank Designation & Location		Capacity (gallons)	Tank Use
Tank 1	Main Tank Farm	4,000	Used oil from maintenance facilities and equipment
Tank 2	Main Tank Farm	4,000	Used oil from maintenance facilities and equipment
Tank 3	Main Tank Farm	4,000	Used oil from electrical equipment containing less than 2 mg/kg (ppm) PCBs
Tank 4	Main Tank Farm	4,000	Used oil from electrical equipment containing 2 to 49 mg/kg (ppm) PCBs

II.C.2. The Permittee shall conduct inspections of used oil storage containers, tanks and secondary containment systems in accordance with Attachment 6 of this Permit. The Permittee shall record the inspector's name, the time and date of the inspection, and the condition of the tanks, storage containers, and secondary containment systems. The Permittee shall document in the inspection log any issues discovered during the inspections (e.g. leaking tanks or water accumulation) and any actions taken by the Permittee to resolve these issues.

II.C.3. The Permittee shall label used oil storage tanks, piping, drums, and containers with the words "Used Oil."

II.C.4. The Permittee shall keep drums and containers of used oil closed except while removing or adding used oil.

II.C.5. The Permittee may not store used oil in units other than tanks, containers, or units subject to regulations under R315-264 or R315-265.

II.C.6. The Permittee shall use earthen berms for containment at its used oil tank farm. It shall place an HDPE welded liner over the berms in a manner that covers the bottom and sides of the containment. The liner shall be keyed into the top of the berms via a toe trench. The floor of the containment shall be covered with a layer of sand. The tanks shall be placed on skids so that they are elevated off the bottom of the floor of the containment.

II.D. Used Oil Loading and Unloading Requirements

II.D.1. The Permittee shall ensure that operations involving the loading or unloading of used are conducted in accordance with Attachment 3.

II.D.2. The Permittee is not authorized to transfer used oil to or from railcars unless this Permit is modified with the information required by R315-15-13.4(a)(16) of the Utah Administrative Code.]

II.E. Used Oil Sampling and Analysis

II.E.1. The Permittee shall sample used oil and other related materials in accordance with the requirements of Attachment 4, Used Oil Sampling and Analysis Plan.

II.F. Used Oil Training

II.F.1. The Permittee shall train handlers of used oil in accordance with R315-15 of the Utah Administrative Code and the requirements of this Permit. New employees may not manage or process used oil without a trained employee present until used oil training is completed.

II.F.2. Employee training shall include documentation that the following topics were covered: identification of used oil, recordkeeping requirements, and facility used oil procedures for handling, transporting, sampling and analysis, emergency response, spill reporting, and personal safety.

II.F.3. The Permittee shall provide, at a minimum, an annual used oil-training refresher course for employees handling used oil. Additional training is required if the Permittee changes used oil handling procedures.

II.F.4. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.

II.F.5. Employees collecting and performing field halogen testing shall be trained and shall demonstrate competence in collecting a representative used oil sample and testing for halogens using a CLOR-D-TECT® kit prior to fieldwork.

II.G. Facility Closure

II.G.1. The Permittee shall implement the closure plan in Attachment 7 which evaluates the potential impacts of used oil operations on the surrounding soil, groundwater and surface water in accordance with R315-15-11 of the Utah Administrative Code. The Permittee shall be responsible for any cleanup of any used oil contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) of the Utah Administrative Code.

II.H. Emergency Spill Response and Remediation

II.H.1. In accordance with R315-15-9.1(a) of the Utah Administrative Code, the person responsible for the spill shall immediately take appropriate action to minimize the threat to human health and the environment and notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or smaller spills if it poses a threat to human health or the environment.

II.H.2. Responders shall take action to prevent spill from spreading by utilizing absorbent, dirt, booms, pads, rags, etc.

II.H.3. The Permittee is responsible for the material release and shall recover oil and remediate any residue from the impacted soils, water, or other property, or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.

II.H.4 Once the material is containerized, a waste determination shall be made to determine the material's disposition.

II.H.5. The Director may require additional cleanup action to protect human health or the environment.

II.H.6. All costs associated with the cleanup shall be at the expense of the Permittee.

II.H.7. Spill kits shall contain, at a minimum, the equipment listed in Table 2 in Attachment 2 of this Permit.

II.H.8. The Permittee shall report all relevant information, including the amount of waste generated from cleanup efforts, the characterization of the waste (i.e. hazardous or non-hazardous), final waste determination, and disposal records. The report shall also include actions taken by the Permittee to prevent future spills.

II.H.9. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

Attachment 1

General Used Oil Operations

Pacific West Operations is located at 5751 North Droubay Road, Erda, Utah 84074, offering used oil recycler service to our customers. Our facility will have four (4) 4,000 gallons above ground storages:

1. 2 each 4,000 gallons used oil tanks from maintenance facilities and equipment. These will be labeled as Tank 1 and Tank 2.
2. One each 4,000 gallon used oil tank for oil from electrical equipment containing less than 2ppm PCB's. This tank will be labeled as Tank 3.
3. One each 4,000 gallon used oil tank for oil from electrical equipment containing 2 to 49 ppm PCB's. This tank will be labeled as Tank 4.

Used oil will be transported into the facility by tanker trucks and in drums. Pacific West collects used oil from the entire State of Utah and surrounding states. The used oil collected and transported is generated from spills associated with railroad locomotive, railroad refrigerated car derailments or accidents, power transformer failures or accidents, fuel or used oil tank overfills and vehicle accidents. The service truck which changes engine oil on site in heavy equipment will transport the used oil to a State of Utah approved used oil facility.

Upon arrival at Pacific West, LLC's facility at Erda, used oil in tanker trucks or drums will be unloaded into the appropriate tank (see above). Used oil will be off-loaded within 24 hours of pick at the Pacific West used oil tank or a customer's site or their approved facility.

Pacific West, LLC will not accept used oil filters, antifreeze, or any hazardous wastes at this facility. Any water that is separated from used oil via gravity separation shall be transferred to an appropriately permitted facility for treatment.

Attachment 2

Contingency Plan and Emergency Response

Pacific West is committed to staging and having on hand all the necessary equipment to mitigate a spill and fire in the event of an emergency. Tanks will be equipped with high level audible alarms and flashing beacon lights visible at the tank farm and inside the adjacent maintenance facility to prevent over filling. All personnel are equipped with cellular devices to communicate with local fire and police as well as others within the site. Eye wash stations, first aid kits, & Fire extinguishers are located inside the shop facility immediately west of the tank containment. Additionally there will be a fire extinguisher located just outside the tank containment berm mounted on a post. There is a 10,000 gallon on site water storage tank immediately adjacent to the proposed tank containment on the southwest corner of the containment as well as a well head with yard hydrant for fire support. There is also an existing concrete containment pad and high pressure washer that is immediately adjacent to the proposed tank storage area. Pacific West is part of the local LEPC (Local Emergency Preparedness Committee) Emergency plan will be reviewed and discussed with the local emergency responders and reviewed on a regular basis as part of the LEPC meetings.

Emergency Response

A. In the event of spill, notify Utah State Department of Environmental Quality, 24-hour Answering Service (801) 536-4123 for a release exceeding 25, gallons, or smaller releases that pose a potential threat to human health or environment. The person first identifying the spill will report it to Pacific West emergency coordinator. The emergency coordinator will assess the quantity of the material released, extent of injuries, if any, and the potential hazards to human health or the environment. The Pacific West emergency coordinator will notify the following:

1. U.S. Environmental Protection Agency
   Nation Response Center
   1(800) 424-8802

2. Utah DEQ
   Regular hours (801) 536-4100
   After hours (801) 536-4123

3. Utah Department of Environmental Quality-DERR
   (801) 536-4100

4. Tooele County Emergency Response Coordinator
   (435) 882-8100

B. The following information will be given to above agencies:

a. Name and phone number of the Pacific West coordinator.

b. Site address (5751 North Droubay Road, Erda Utah) and where on the facility the release occurred.

c. Time and date of the incident occurred.

d. Type of incident (i.e., tank hole, hose broken, etc.).

e. Quantity of material spilled (i.e., 1,000 gallons of used oil, etc.).

f. Extent of injuries, if any.

g. Potential hazards to human health and the environment that include skin and eye irritation, neurologic, breathing problems and stress.

C. The Pacific West coordinator will direct action to do the following:

1. Eliminate the source of spill.

2. Contain any material already spilled.

   a. If fuel or used oil breaches the containment area, start building a second containment. (Use absorbents or earth materials).

3. Isolate all unaffected areas from the affected area.

4. Rope off the affected area.

5. Restrict access to authorized personnel only.

6. Begin cleanup as soon as possible:

   a. Liquids will be pumped, scooped up, absorbed or otherwise transferred to an appropriate container.

   b. Solids will be swept or shoveled into an appropriate container.

   c. All recovered material will be recycled at our facility.

D. List of Pacific West Emergency Coordinators

In case of a spill, the following person will act as the primary emergency coordinator:

Mr. Dustin Hall – Pacific West Operating Manager.
(801) 972-2727 – Office

(801) 514-3623 – Cellular

Secondary Pacific West emergency coordinator is:

Mr. Michael Forrest – President
(801) 972-2727 – Main Office
(801) 510 7300– Cellular

E. Written Reports

Within five (5) days after a reportable incident, the Pacific West coordinator will submit a written report to the Regional Administrator of the Environmental Protection Agency, Region VIII. Additionally, within 15 days following a reportable incident, Pacific West will submit a written report to the State of Utah, Division of Waste Management and Radiation Control Division Director. The report will contain the following information:

1. Name and phone number of the Pacific West emergency coordinator.

2. Pacific West, LLC Field Location Facility, Erda Pit
5751 North Droubay Road, Tooele, Utah 84074.

3. A description of the spill, including its date, time, and nature.

4. The operations involved.

5. The clean-up actions taken.

6. The changes in operational procedures and/or equipment to prevent such spills in the future.

7. The extent of injuries, if any.

8. An assessment of actual or potential hazards to human health or the environment, where applicable.

9. The estimated quantity and disposition of recovered material that resulted from the incident.

SPILL CONTROL EQUIPMENT

Because Pacific West is an environmental spill cleanup contractor for several different entities we have on hand at our Shop Facility adjacent to the tank containment area: 10 bags of oil absorbent pads 34" X 38", 10 bags of oil absorbent pads 17" X 19", 500 ft. of oil absorbent booms, and 10 ea. 55 gallons drums. These materials are stored in fencing in storage area located against the east wall of the Shop Facility.

Table 2: Spill Kit Requirements

Equipment Description	Quantity
Shovel	2
Buckets	4
Drums (55-gal)	10
Absorbent pads 34" x 38"	10 bags
Absorbent pads 17" x 19"	10 bags
Oil absorbent booms	500 feet
Granulated absorbent (bags)	20
Spill Plan with Emergency Contact Numbers	1

SUBSTANTIAL HARM DETERMINATION

Pacific West has determined that this facility could not, because of its location, reasonably be expected to cause substantial harm to the environment by discharging oil into on the navigable waters or adjoining shorelines as defined in 40CFR 112.120(A)(2). The certification form in making this determination is provide in Appendix A.

SPILL PREVENTION AND COUNTERMEASURE PLAN

1. No tanks are to be filled without first checking levels.
2. No pumps are to be operated unattended.
3. Gates, tank valves are to be locked and power to pump turned off when the site is unattended.
4. Tanks, piping, valves, pump and hoses are to be checked daily for any sign of leaks, deterioration or vandalism. (See also SPCC Inspection Sheet in Attachment 6.)
5. Warning signs are posted to check for line disconnection before moving equipment.
6. Fire extinguisher is present and in good working order.

IN EVENT OF SPILL

1. Report spills to facility supervisor immediately.
2. Turn off power to pump (switch located on pole south of tank).
3. Check valves to see if open.
4. Keep unauthorized persons out of area.
5. If fuel breaches containment area, start building a second containment. (Use absorbents or earth materials)

Attachment 3

Used Oil Loading and Unloading Operations

The following procedures are to be utilized when loading and unloading used oil:

1. Operators of used oil handling equipment shall use Level D PPE with the addition of the following:
   a. Long sleeved shirts will be worn.
   b. All clothing shall be flame retardant treated.
   c. Gloves with forearm gauntlets shall be worn.
   d. A face shield shall be worn.

2. Prior to loading/unloading, the used oil transport driver will have secured the vehicle by positioning wheels chocks and applying the emergency brakes before loading or unloading used oil. At the unloading facility at Erda, UT, the truck will be positioned for unloading on the unloading pad which has traversable curbing around its perimeter to contain any spills.

3. The Operator shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.

4. The Operator shall ensure the amount of used oil to be loaded into the tanks will not exceed the capacity using a calibrated gauging instrument.

5. During loading and unloading operations, the trained Operator shall remain at the transfer location and maintain control of the operations throughout the entire used oil transfer.

6. The Operator shall cleanup any spills and drippings from the used oil transfer and properly manage the cleanup materials.

7. Volumes transferred shall be documented in a tank log.

Attachment 4
Used Oil Sampling and Analysis Plan

USED OIL SAMPLING PROCEDURES

PACIFIC WEST LLC

Samples will be collected in pre-cleaned glass containers and stored and transported in specially designated portable coolers. These supplies will be provided by a Utah accredited analytical laboratory.

Containers will be labeled with date and time, sample type, sample location, unique sample number, and the samplers' signature. The contract analytical laboratory will provide labels. Nitrile gloves will be worn during the collection of each individual sample and changed between samples. The samples will be stored in the field in chilled coolers (4° C). The samples then will be moved to a refrigerator or delivered to an analytical laboratory within the sample holding time specified for the analytical methods selected. Proper chain of custody protocol will be followed.

Sampling Drum/Totes:

Glass Oil Thief:

- Remove the cover from the sample container.
- Insert glass tubing almost to the bottom of the drum or until a solid layer is encountered. About one foot of tubing should extend above the drum.
- Cap the top of the sampling tube with a stopper or thumb, ensuring liquid does not come into contact with stopper.
- Carefully remove the capped tube from drum and insert the uncapped end into appropriate sample container.
- Screen sample using CLOR-D-TECT or HYDROCLOR-Q, halogen test kit or prepare sample to send to a Utah certified laboratory.

Sampling Tanks:

Sampling Equipment:

Dip tube sampler (Polypropylene/ plastic type tube) sampler.

- Lower the sampling tube slowly into the liquid waste at a rate that allows the liquid level inside and outside the tube to equalize. Manways located at the top of the Tank will be used to collect samples.
- Slowly withdraw Dip tube from the liquid. Either wipe the exterior of the sampler tube with a disposable cloth or allow excess liquid to drain back into the used oil container/tank.
- Discharge the sample by placing the lower end of the Dip tube into a sampling bucket.
- Screen sample using CLOR-D-TECT or HYDROCLOR-Q, halogen test kit or prepare sample to send to a Utah certified laboratory.
- Empty the sample in the bucket back into the used oil container/tank. Cap the top of the sampling tube with a stopper or thumb, ensuring liquid does not come into contact with stopper.

In addition to the above procedures, Pacific West shall follow the protocols below:

1. The sampling shall be performed by personnel trained on appropriate sampling methods for each type of container and matrix

2. Samples will be taken in a manner that ensures that they are representative.

3. Composite sampling:

   a. Samples collected from containers greater than 55 gallons shall be individual samples, not composite samples.

   b. Samples collected from containers smaller than 55 gallons may be composited only if the used oil in those containers came from one piece of equipment.

   c. Samples collected from containers smaller than 55 gallons shall not be composited if the used oil in those containers comes from multiple pieces of equipment. Containers of used oil from different sources, pieces of equipment, or processes shall be sampled individually.

4. Tank samples shall be collected in accordance with ASTM D7831.

5. Pacific West shall document the used oil was screened for halogens using either Method 9077, the Dexsil Clor-N-Oil 50 ppm® test kit, or PCB laboratory analysis supplied by Rocky Mountain Power for oil from electrical equipment.

6. Prior to accepting used transformer oil, Pacific West shall obtain analytical data confirming the PCB concentration of the used oil is less than 50 mg/kg (ppm) in accordance with Table 3.

7. When screening for halogens using Dexsil field screening kits, Pacific West shall use one of the following:

a. CLOR-D-TECT® halogen test kit (EPA Method 9077) for oil containing less than 20% water; or

b. HYDROCLOR-Q® test kit if the oil contains between 20 and 70% water using the following conversion formula:

True Halogen Concentration = Reading Syringe + [(10 + ml oil in sample)/10]

Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:

2,000 ppm [(10 ml + 4 ml)/10] = 2,800 ppm; or

c. HYDROCLOR-Q® test kit without correction, for oil containing greater than 70% water.

8. Pacific West shall document on acceptance records the screening results to determine if the total halogens concentration of the incoming used oil is less than 1,000 ppm.

9. In lieu of screening with a CLOR-D-TECT® kit, method 9077, Pacific West may collect and submit representative used oil samples to a Utah-certified laboratory to analyze for total halogen concentrations using EPA method 9076 prior to placing used oil into the tanks.

10. PCB Contaminated Used Oil:

a. Pacific West shall not accept for storage or processing used oil with PCB concentrations greater than or equal to 50 mg/kg.

b. Records of any laboratory test results used to demonstrate PCB concentrations shall be attached to the transportation record.

c. Used oil may not be diluted to avoid any PCB provision of any federal or state environmental regulation.

Table 3 -- PCB Sample Preparation and Analytical Methods

Sample Preparation	Analytical Procedure	Analytes	
		PCB CAS RN	***PCB Aroclor***
3580A	• PCB Analytical Method-8082A® • Analyses of the Aroclors® bolded in the last column are mandatory. • Additional Aroclors® should be analyzed if the oil typically contained that specific Aroclor®.	**12674-11-2**	**1016**
		147601-87-4	1210
		151820-27-8	1216
		11104-28-2	**1221**
		37234-40-5	1231
		11I4I-I6-5	**1232**
		71328-89-7	1240
		53469-21-9	**1242**
		12672-29-6	**1248**
		165245-51-2	1250
		89577-78-6	1252
		11097-69-1	**1254**

		11096-82-5	**1260**
		37324-23-5	1262
		11100-14-4	1268

Rebuttable Presumption:

1. Used oil that fails the halogen screen or analytical results with concentrations greater than 1,000 ppm is presumed to have been mixed with a hazardous waste.

2. Pacific West may rebut the hazardous waste presumption in accordance with R315-15-4.5 of the Utah Administrative Code if Pacific West can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in Appendix VIII of EPA CFR 40, Part 261.

3. Halogenated compounds that must be considered in the rebuttable presumption are listed in 40 CFR 261 Appendix VIII, which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides and dioxin/furans.

4. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in Subsection R315-15-2.5(c) of the Utah Administrative Code to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.

5. The rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFCs are destined for reclamation. The rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units.

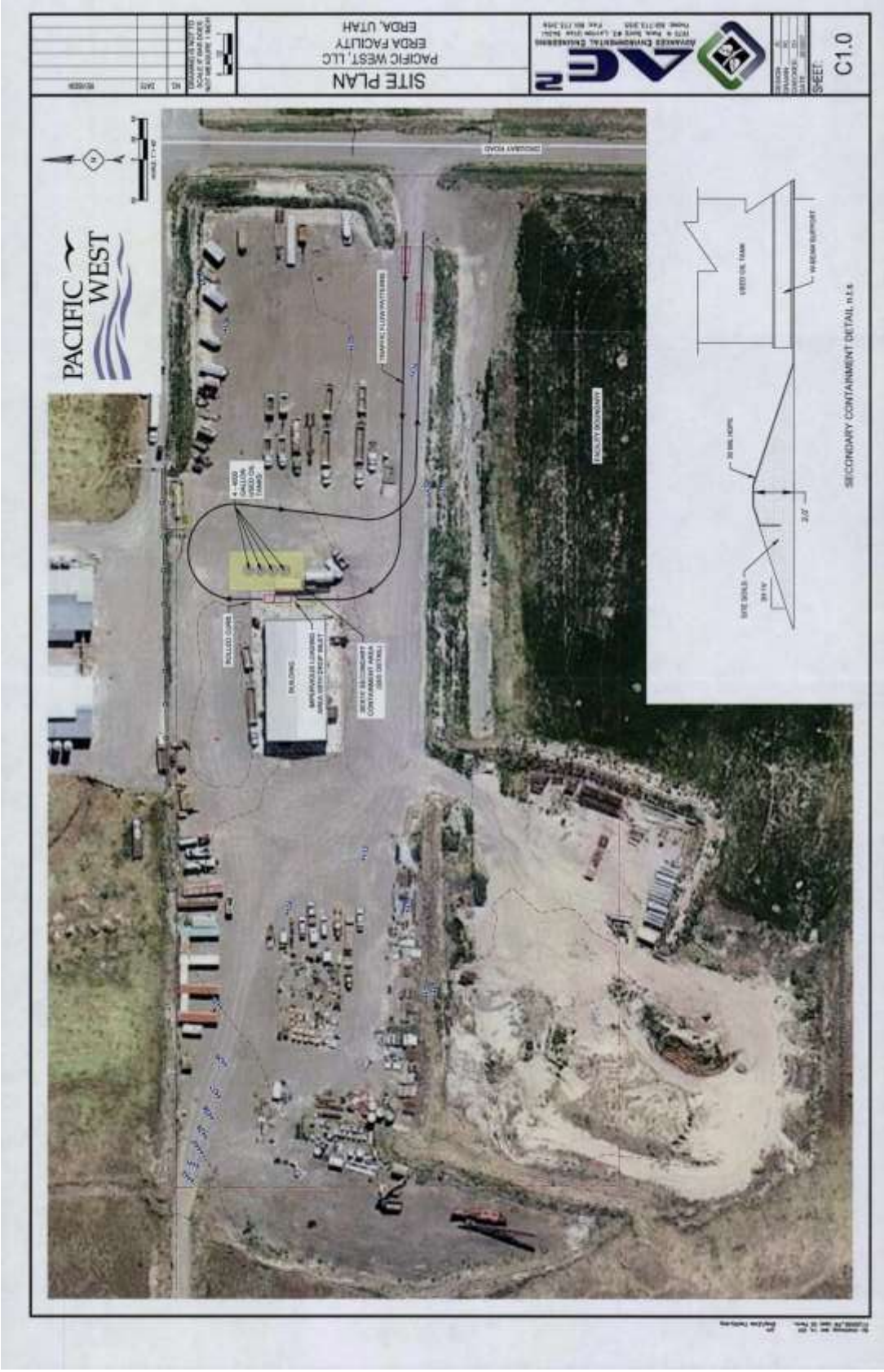
6. Used oil that exceeds the halogen content of 1,000 ppm is presumed to be a hazardous waste and shall not be placed into the facility tanks, vehicles or storage vessels unless Pacific West rebuts the hazardous waste presumption in accordance with the rebuttable presumption requirements above.

Attachment 5

Facility Diagram and Piping and Instrument Drawings

When the facility tanks are constructed, Pacific West shall a permit modification to submit a PID drawing of the used oil tank farm and loading area, certified by a Utah professional engineer.


Pacific West Facility
From Hwy 36 turn East on Bates Canyon Rd. go .9 Miles turn North on Droubay Rd. go .7 miles Pacific West Facility is on the West.
Legend
Route
Erda Shop
4-4000 gallon Used oil Tanks
Erda UT
Derail
Swit
Turn left onto Droubay Rd
Turn left onto Droubay Rd
Oswego Rd
Gravel Access Rd
Heidi Way
Hwy 36
Google Earth
2000 ft
N


SITE PLAN
PACIFIC WEST, LLC
ERDA FACILITY
ERDA, UTAH
PACIFIC WEST
SECONDARY CONTAINMENT DETAIL N.T.S.
C1.0


DROUBAY ROAD
TRAFFIC FLOW PATTERNS
FACILITY BOUNDARY
4 - 4000 GALLON USED OIL TANKS
ROLLED CURB
BUILDING
IMPERVIOUS LOADING AREA WITH DROP INLET
30'X74' SECONDARY CONTAINMENT AREA (SEE DETAIL)

Attachment 6

Inspections and Maintenance Schedules

PACIFIC WEST

SPCC INSPECTION SHEET
ERDA, UTAH

Inspection by:_____

Date:_____

INSPECTION AREA	FREQUENCY	INSPECTION INSTRUCTIONS	INSPECTION RESULTS
4 - 4,000 gallon above ground used oil tanks	Weekly	Examine overall tank condition looking especially for corrosion, bulges or dents, etc. Inspect secondary containment for integrity and presence of precipitation. Look for evidence of leaks from tanks and associated equipment.	
6,000 gallon above ground diesel fuel tank	Weekly	Examine overall tank condition looking especially for corrosion, bulges or dents, etc. Inspect secondary containment for integrity and presence of precipitation. Look for evidence of leaks from tanks and associated equipment.	
Secondary Containment	**Weekly**	Examine visually all materials associated with the tank farm secondary containment for any defects, damage, or failures that would effect the containment of any spilled products or tank failure.	

***** In addition to these scheduled inspections, containers should be checked frequently as part of ongoing operations procedures.**

Attachment 7

Cleanup and Closure Plan

The purpose of this closure plan is to identify procedures and related costs necessary to safely remove all used oil and residues returning the site to original condition. The closure plan determines the financial requirements necessary to protect human health and the environment upon closing the facility. This closure plan was prepared in accordance to R315-15-11.

Closure Conditions and Procedures:
All storage tanks are located within a secondary containment system with impervious floors and walls. The off and on loading area is on an impervious surface with drain to a collection basin. Site closure may involve an ownership transfer to another company that may want the used oil infrastructure to remain in place or a full closure. A full closure would involve disassembly and removal of all oil and structures described in further detail below. The closure costs reflect the full closure scenario.

Characterization and Removal of Used Oil:

1. If the site closure were to involve the removal of oil, tanks, structures, all of the used oil would be drained and removed and transported to another permitted used-oil facility. Used oil that is transferred from our facility will have been determined to be non-hazardous from field testing performed prior to it being brought in and laboratory testing that is done after it arrives. Therefore, it is not anticipated that any additional testing of the oil would be required, unless it was required by the facility that the used oil was being transferred to.
2. Any off-site hauling of any used oil shall be by a Department of Transportation Certified Transporter with proper documentation and a Used Oil Transporter Permit issued by the Utah Division of Waste Management and Radiation Control (Division).
3. Oil that is in drums at the time of site closure may be removed as drums or alternatively may be pumped into a tank truck for transportation to an approved recycler or disposal facility. Empty drums will be shipped to an approved recycler/disposal facility if they are no longer needed at the facility.

Decommissioning and Removal of Tanks, Piping, and Secondary Containment (If site closure is to involve facility abandonment):

1. Once used oil is removed from the fixed location tanks, samples of tank bottoms shall be collected to determine if they have hazardous waste characteristics. The tank bottoms shall also be sampled for PCBs. Analytical analysis of the samples will determine disposal options for these materials. No less than one (1) sample shall be collected from each fixed location tank and analyzed.
2. Once the results of the tank bottoms sampling are received, the tank bottoms shall be removed for off-site transport and disposal. The methods and means of disposal of the tank bottom sediments shall be based on if the bottoms are determined to be hazardous, non-hazardous, or "Special Waste" materials (as defined in R315-301-2(71)). All sediments will be taken to an appropriately permitted solid waste disposal facility following any additionally required characterization. If the sediments are determined to be hazardous waste, they will be taken to a permitted hazardous waste disposal landfill.

3. The interiors of the fixed location tanks and pipings shall be rinsed and cleaned following the removal of all oil and tank bottoms. The rinsing and cleaning process shall involve a rinse with diesel fuel followed by a triple rinse with water. The generated rinsates shall be collected and transported for off-site disposal (likely to a POTW) once they has been adequately sampled and characterized based on the requirements of the receiving facility or to another facility permitted to accept such wastes.
4. Following the rinsing of tanks and piping and removal and disposal of rinsate water, the tanks and piping shall be disassembled and prepared for off-site transport. The tanks would be either stored on-site, sold and removed, or cut-up for scrape and taken to a recycling facility. Depending on the ultimate destination of the tanks and piping, wipe samples may be collected from the interior areas prior off-site transport. Costs for such has been included in the closure plan cost estimate.
5. Following the removal of above ground tanks and piping, secondary containments and paved loading and off-loading areas may be broken up and removed for off-site disposal at a recycling facility or a permitted disposal site. If removed materials require classification as "Special Waste" materials (as defined in R315-301-2(71)) based on testing results, they will be taken to an appropriately permitted solid waste disposal facility.

Soil Contamination Characterization and/or Remediation:

1. Following the removal of all used oil and any necessary tanks, piping, and secondary containment, an investigation into the extent and impacts from the site operations on soil and/or groundwater will be conducted.
2. The investigation into the extent and impacts from site operations to soil and/or groundwater would involve the drilling of test holes and/or borings and the collection of soil samples and/or groundwater samples to be submitted to a State of Utah approved laboratory. The Owner will coordinate with the Division as to the location of these borings.
3. The soil and/or groundwater investigation borings shall be logged by a qualified environmental professional for stratigraphy and for evidence of contamination and shall be sent to a Utah accredited Laboratory. The Laboratory will test the samples for PCB, RCRA metals, and hydrocarbon concentrations as shown in the Estimated Closure Cost table in Attachment 8 and item 5 below.
4. The findings from the soil investigation would be used to determine if any remediation is necessary and/or to outline a plan for remediation. If it is determined from sampling that the excavated soils can be classified as "Special Waste" materials (as defined in R315-301-2(71)) based on testing results, they will be taken to a permitted solid waste disposal facility.
5. Soil/Groundwater samples collected during closure shall be analyzed for semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), RCRA metals, and PCBs (congener analysis). Pacific West shall submit a Level IV data validation analytical package from a Utah- certified laboratory, within 30 days of receipt, to the Director for review and approval.
6. If groundwater is encountered during sampling, it will be sampled and analyzed.
7. Pacific West shall coordinate with the Division during closure to provide opportunity for Division representatives to be present during sampling events.

Third Party Closure Verification Report:

1. Following the completion of all site closure activities, a Final Third Party Closure Verification Report shall be prepared by a Utah Registered Professional Engineer to verify that aspects of this Closure Plan have been met.
2. The aspects of the Closure Plan shall be deemed executed upon receipt by the Owner of a No Further Action letter issued by the Division Director.
3. If significant contamination is discovered beyond levels addressable by the procedures outlined above, the Owner will submit a site investigation/characterization plan to the Division for approval.

Attachment 8

Closure Costs and Surety Bond
Pacific West, LLC

The estimated closure costs and assumptions used for the cost estimate are outlined and provided in Attachment 7. The Owner shall obtain a financial assurance mechanism of closure costs in accordance with the requirements described in R315-15-12.3. The financial assurance mechanism shall be among those listed as acceptable and the Owner shall notify the Division Director that a copy of the bond has been placed in the operating record.

The amount of the financial assurance mechanism shall be adjusted on an annual basis for inflation. The amount shall also be adjusted for any increase in used oil storage capacity or modifications to the used oil processes at the facility.

The Owner shall also establish a financial assurance mechanism at the time the bond is established that shall meet the requirements of Subsection R315-15-12.3, and the financial assurance mechanism shall follow the wording provided by the Division Director found in Subsection R315-15-17.

Completed and signed copies of the financial assurance mechanism and Financial Guarantee forms are attached at the end of this section following the table.

1975 North Main Street; Suite #3
Layton, UT 84041
Phone: (801) 773-3155
Fax: (801)773-3156

CLIENT: Pacific West
PROJ: Erda Facility
BASIS: Previous Closure Costs Estimates and Bids, 2018 Lab Price List
PREP: Chet Hovey, P.E.
DATE: 11/09/17

Engineer's Opinion of Probable Closure Costs

Item	Description	Quantity	Unit	Unit Cost	Total
1. Characterization and Removal of Used Oil					
	Sample Remaining Used Oil				
	Total Halogen Analysis, PCBs method 8082A	10	Sample	125	$ 1,250.00
	Off-Site Transportation of Used Oil				
	Pump, remove, and haul used oil	16000	Gallon	0.08	$ 1,280.00
				Subtotal	**$ 1,280.00**
2. Decommissioning and Removal of Tanks, Piping, Secondary Containment, and Loading Areas					
	Rinse ASTs and Piping and Disposal Rinsate				
	Rinse Tanks	5000	Gallon	$ 0.50	$ 2,500.00
	Water Samples	4	Sample	$ 125.00	$ 500.00
	Dispose Water	5000	Gallon	$ 0.50	$ 2,500.00
	Off-Site Transport/Disposal of Tank Bottom Sediments				
	Total Halogen, RCRA Metals Analysis	10	Sample	$ 178.00	$ 1,780.00
	Sediment Removal and Disposal (non-hazardous)	4	tons	$ 125.00	$ 500.00
	Sediment Removal and Disposal (hazardous)	1	tons	$ 300.00	$ 300.00
	Disassemble Tanks and Piping/Remove Materials				
	Dissamble Tanks	1	Lump Sum	$ 10,000.00	$ 10,000.00
	Wipe Samples (RCRA metals)	15	Sample	$ 160.00	$ 2,400.00
	Tank Removal	40	tons	$ 100.00	$ 4,000.00
	Sampling of Off-Site Disposal of Concrete Containments				
	Samples (hydrocarbons, RCRA Metals)	5	Sample	$ 225.00	$ 1,125.00
	Concrete hauling and disposal (non-contaminated)	40	tons	$ 50.00	$ 2,000.00
	Sampling of Off-Site Disposal of Secondary Containment				
	Samples (hydrocarbons, RCRA Metals)	5	Sample	$ 225.00	$ 1,125.00
	Liner hauling and disposal (non-contaminated)	1	tons	$ 95.00	$ 95.00
	Soils hauling and disposal (non-contaminated)	12	tons	$ 60.00	$ 720.00
				Subtotal	**$ 29,545.00**
3. Contaminated Soil and/or Concrete Characterization and/or Remediation					
	Soil/Groundwater Subsurface Investigation				
	Soil Borings	100	Feet	$ 15.00	$ 1,500.00
	Soil Samples (TEH, metals, halogens, VOC, SVOC, flash point, PCBs)	10	Sample	$ 739.00	$ 7,390.00
	Groundwater Samples (TEH, metals, halogens, VOC, SVOC, PCBs)	2	Sample	$ 704.00	$ 1,408.00
	Level 4 QC Data Validation Analytical Package	1	Report	$ 2,639.40	$ 2,639.40
	Geologist (report, project manager)	40	Hours	$ 100.00	$ 4,000.00
	Remove/Dispose Contaminated Concrete and/or Soil				
	Concrete hauling and disposal (contaminated)	20	Tons	$ 125.00	$ 2,500.00
	Soil hauling and disposal (contaminated)	100	Tons	$ 125.00	$ 12,500.00
	Backfill and regrading	100	Tons	$ 25.00	$ 2,500.00
				Subtotal	**$ 34,437.40**
4. Third Party Closure Verification Report					
	Professional Engineer	40	Hours	$ 100.00	$ 4,000.00
				Subtotal	**$ 4,000.00**
TOTAL FINANCIAL ASSURANCE ESTIMATE					**$ 69,262.40**

>>>REPLACE WITH UPDATED VERSION

—should include PCBs in tank bottoms